

## REMARKS

### A. Status of the Pending Application

Claims 1-39 are pending in the application. Claims 1-39 stand rejected under 35 U.S.C. § 102(b) as unpatentable over *Moroto et al.* (U.S. Patent No. 4,954,959).

### B. Objections to the Specification

Applicant has amended the Abstract as suggested by the Examiner. Accordingly, the Examiner's objection has been overcome and notice to that effect is earnestly solicited.

### C. Objections to the Claims

Applicant has amended claims 24 and 25 to remove "any combination thereof." The Examiner asserts that claim 9 contains the limitation "any combination thereof." However, claim 9 does not contain this limitation. Applicant respectfully requests that the Examiner enter the above-described amendment to claims 24 and 25 and withdraw the outstanding objection to claims 9, 24, and 25.

### D. Prior Art Rejections

#### 1. Claims 1-39 are not anticipated by *Moroto et al.* (U.S. Patent No. 4,954,959)

The Office Action rejects claims 1-39 under 35 U.S.C. § 102(b) as unpatentable over *Moroto et al.* (U.S. Patent No. 4,954,959). Applicants respectfully traverse this rejection.

Claim 1 recites a database system for a navigation device, comprising a first database comprising at least first data, a second database comprising at least second data, a working memory unit comprising a first and second memory area, and a processor. The first data comprises street information, and the second data comprises location information. The first data is stored in the first memory area and the second data is stored in the second memory area. Claim 18 recites a global positioning navigation system comprising, among other features, a working memory unit comprising a first memory area and a second area, where the first data

comprises street information and the second data comprises location information and where the first data is stored in the first memory and the second data is stored in the second memory area. Claim 35 recites a method for providing information to a navigation device, comprising, among other features, providing data of the first type to a first dedicated memory area of a working memory unit and providing data of the second type to a second dedicated memory area, separate from the first memory area, of the working memory unit. Claim 36 recites a method for operating a navigation device in a vehicle, comprising, among other features, providing the first data to a first dedicated memory area of a working memory unit and providing the second type of data to a second dedicated memory area of a working memory unit.

*Moroto et al.* is directed to a navigation system with external storage of map and guidance information. The Examiner alleges that *Moroto et al.* discloses all the limitations of claims 1, 18, 35, and 36 including a working memory comprising a first memory area and a second memory area, where the first data is stored in the first memory area and the second data is stored in the second memory area (Office Action p. 3). Applicant respectfully disagrees.

*Moroto et al.* does not disclose a working memory comprising a first memory area and a second memory area, where the first data is stored in the first memory area and the second data is stored in the second memory area. *Moroto et al.* discloses a first external storage device (Fig. 1, element 16) and a second external storage device (Fig. 1, element 17). *Moroto et al.* also discloses a random access memory (RAM) (Fig. 1, element 20; Col. 3:29-31). However, the first and second external storage devices disclosed by *Moroto et al.* are not working memory, as required by the recited features of claim 1. They are merely storage devices.

The RAM disclosed by *Moroto et al.* is not divided into a first memory area and a second memory area, where the first data is stored in the first memory area and the second data is stored in the second memory area as required by the claimed features. Indeed, the RAM is not portioned or divided in any manner. Thus,

*Moroto et al.* does not disclose or suggest partitioning the RAM into different memory areas for storing first and second data, where the first data comprises street information, and the second data comprises location information.

*Moroto et al.* also does not disclose or suggest features of the dependent claims. Claims 15 and 32, depending from claims 1 and 18, respectively, recite a third database. The Office Action asserts that *Moroto et al.* discloses a third database, purported as represented by the read only memory unit (ROM) (*Moroto et al.*, Fig. 1, element 19). Applicant respectfully disagrees. *Moroto et al.* does not disclose or teach a third database, *Moroto et al.* only describes the ROM as a storage element for storing an application such as a navigation application. (*Moroto et al.*, Col. 5: 40-42). Thus, *Moroto et al.* does not disclose or suggest a third database.

Claims 16 and 33, which depend from claims 15 and 32, respectively, recite that the third database comprises blocks of data corresponding to the second data. As with claims 15 and 32, *Moroto et al.* does disclose or suggest a third database. Moreover, *Moroto et al.* does not disclose or suggest a third database having blocks of data that correspond to the second data.

Claims 17 and 34 recite “where the third database comprises an index.” As set forth above, *Moroto et al.* does not disclose or teach a third database. Nor does *Moroto et al.* teach a third database that comprises an index. There is no mention of blocks of data or indices related to the ROM (which the Examiner applies as the alleged third database) in *Moroto et al.*

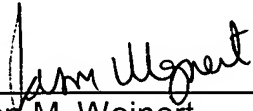
For these reasons, claims 1, 18, 35, and 36, and claims 2-6, 10-12, 19-23, and 27-29 depending therefrom, are patentable and should be allowed over *Moroto et al.*

## **E. Conclusion**

Applicants respectfully requests withdrawal of the pending rejections and allowance of the claims. The Examiner is invited to contact the undersigned Attorney

via telephone if the Attorney can answer any of the Examiner's questions, comments, or concerns.

Respectfully submitted,

  
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